

**UNITED STATES DISTRICT COURT
IN THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

**ALBERT ELIEZER MARTINEZ,
aka "Pipo,"
ANTHONY F. D'AMBROSIO,
ANTONIO DELGADO,
aka "Little Tony,"
ARMANDO ENRIQUE DELGADO,
KEANU DAVONE MARTINEZ, and
BRANDON LEE HILL
Defendants.**

NO. 1:15-CR-0003

(JUDGE CALDWELL)

(FILED UNDER SEAL)

**FILED
HARRISBURG, PA**

MAR 11 2015

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

From in or about July 2012 through in or about January 2015, within the Middle District of Pennsylvania and elsewhere, the defendants,

ALBERT E. MARTINEZ, ANTHONY D'AMBROSIO, ANTONIO DELGADO, ARMANDO DELGADO, and KEANU MARTINEZ

aided and abetted each other, did knowingly recruit, entice, harbor, transport, provide, obtain and did maintain by any means in and affecting interstate commerce a person, and benefited financially and received anything of value from participation in a venture that engaged in such acts, and knowing and in reckless

disregard of the fact that this individual had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

From in or about July 2012 through in or about January 2015, within the Middle District of Pennsylvania and elsewhere, the defendants,

ALBERT E. MARTINEZ, ANTHONY D'AMBROSIO, ANTONIO DELGADO, ARMANDO DELGADO, and KEANU MARTINEZ

aiding and abetting each other, on numerous occasions, did knowingly transport an individual in interstate commerce with the intent that the individual engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

From in or about July 2012 through in or about January 2015, in the Middle District of Pennsylvania and elsewhere, the defendants,

ALBERT E. MARTINEZ, ANTHONY D'AMBROSIO, ANTONIO DELGADO, ARMANDO DELGADO, and KEANU MARTINEZ

aiding and abetting each other, did knowingly transport and caused to be transported an individual who had not attained the age of 18 years in interstate and foreign commerce, with the intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR

From in or about July 2012 through in or about January 2015, within the Middle District of Pennsylvania and elsewhere, the defendants,

ALBERT E. MARTINEZ, ANTHONY D'AMBROSIO, ANTONIO DELGADO, ARMANDO DELGADO, KEANU MARTINEZ, and BRANDON HILL

knowingly and willfully conspired and agreed with each other, and other persons known and unknown to the Grand Jury, to commit offenses against the United States, including transporting any individual in interstate commerce with intent that such individual engage in prostitution, in violation of Title 18, United States Code, Section 2421.

Overt Acts

In furtherance of the conspiracy and to effect its objects, the following overt acts, among others, were committed in the Middle District of Pennsylvania and elsewhere:

1. From in or about July 2012 through January 2015, Albert Martinez operated a prostitution business by advertising escort services on www.backpage.com. He would direct girls and women to handle the incoming telephone calls and then provide the details about where they were to meet the men to engage in sexual activities for a fee.

2. From in or about July 2012 through January 2015, as part of running the prostitution business, Albert Martinez instructed the girls and women as to how much money to charge customers for particular sex acts and how to ensure a customer was not a law enforcement officer.

3. From in or about July 2012 through January 2015, as part of running the prostitution business, Albert Martinez conspired with other individuals he employed to run the prostitution business, including Anthony D'Ambrosio, Antonio Delgado, Armando Delgado, Keanu Martinez, and Brandon Hill. These individuals provided a variety of services, including but not limited to acting as drivers, security, collecting money, supplying and delivering controlled substances and assisting with posting advertisements.

4. From in or about July 2012 through January 2015, Albert Martinez, Anthony D'Ambrosio, Antonio Delgado, Armando Delgado, and Keanu Martinez received monetary compensation, usually between 50%-100% of the money the girls and women made for acts of prostitution. Martinez and the others would frequently compensate the girls and women by providing them with controlled substances, including oxycodone (percocet), heroin, cocaine and marijuana.

5. From in or about July 2012 through January 2015, Brandon Hill supplied Albert Martinez and his co-conspirators with controlled substances,

including but not limited to oxycodone (percoset), to distribute to the girls and women working in the prostitution business.

6. From in or about July 2012 through January 2015, Albert Martinez and his co-conspirators arranged for individuals to travel from the Middle District of Pennsylvania to the states of Maryland, West Virginia, Virginia, Florida, Rhode Island and the District of Columbia for the purpose of working as prostitutes on behalf of the prostitution business.

7. On multiple occasions, from in or about October 2013 through April 2014, Albert Martinez, Anthony D'Ambrosio and others arranged for "Minor A," a person under the age of 18, to work for the business as a prostitute in the Middle District of Pennsylvania and Maryland. Frequently, Albert Martinez or Antonio Delgado drove or caused Minor A to be driven from the Middle District of Pennsylvania to the state of Maryland to work as a prostitute.

8. In or about October 2013, D'Ambrosio engaged in sexual intercourse with Minor A as part of her "interview" process for the prostitution business.

9. On multiple occasions, from in or about December 2014 through January 2015, Albert Martinez and others arranged for "Minor B," a person under the age of 18, to work for the business as a prostitute in the Middle District of Pennsylvania and Maryland. Frequently, Albert Martinez, Antonio Delgado or Armando Delgado drove or caused Minor B to be driven from the Middle District of Pennsylvania to the state of Maryland to work as a prostitute.

10. On multiple occasions, from in or about January 2014 through November 2014, Albert Martinez, Antonio Delgado, Keanu Martinez and others arranged for "Minor C," a person under the age of 18, to work for the business as a prostitute in the Middle District of Pennsylvania and in Maryland. Frequently, Albert Martinez, Antonio Delgado or Keanu Martinez drove or caused Minor C to be driven from the Middle District of Pennsylvania to the state of Maryland to work as a prostitute.

11. In or about April 2014, Martinez engaged in sexual activities with Minor C as part of her "interview" process for the prostitution business.

12. On multiple occasions, from in or about January 2014 through April 2014, Albert Martinez, Antonio Delgado, Keanu Martinez and others arranged for "Minor D," a person under the age of 18, to work for the business as a prostitute in the Middle District of Pennsylvania and in Maryland. Frequently, Albert Martinez, Antonio Delgado or Keanu Martinez drove or caused Minor D to be driven from

the Middle District of Pennsylvania to the state of Maryland to work as a prostitute.

All in violation of Title 18, United States Code, Section 371.

THE GRAND JURY FURTHER CHARGES:

COUNT FIVE

From in or about July 2012 through in or about January 2015, in the Middle District of Pennsylvania and elsewhere, the defendants,

**ALBERT E. MARTINEZ, ANTHONY D'AMBROSIO, ANTONIO
DELGADO, ARMANDO DELGADO, KEANU MARTINEZ, and
BRANDON HILL**

knowingly and willfully conspired and agreed with each other, and other persons known and unknown to the Grand Jury, to transport and cause to be transported an individual who had not attained the age of 18 years, in interstate and foreign commerce, with the intent that such individual engage in prostitution and sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Sections 2423(a).

All in violation of Title 18, United States Code, Section 2423(e).

THE GRAND JURY FURTHER CHARGES:

COUNT SIX

From in or about July 2012 through in or about January 2015, in the Middle District of Pennsylvania and elsewhere, the defendants,

**ALBERT E. MARTINEZ, ANTHONY D'AMBROSIO, ANTONIO
DELGADO, ARMANDO DELGADO, KEANU MARTINEZ, and
BRANDON HILL**

did intentionally, knowingly, and unlawfully combine, conspire, and agree with each other, and with others both known and unknown to the Grand Jury, to distribute and possess with the intent to distribute oxycodone (percoset), cocaine hydrochloride, heroin, and marijuana, all being scheduled controlled substances.

All in violation of Title 21, United States Code, Section 846.

THE GRAND JURY FURTHER CHARGES THAT:

COUNT SEVEN

From in or about July 2012 through in or about January 2015, within the Middle District of Pennsylvania and elsewhere, the defendants,

ALBERT E. MARTINEZ, ANTHONY D'AMBROSIO, ANTONIO DELGADO, ARMANDO DELGADO, KEANU MARTINEZ, and BRANDON HILL


aided and abetted by each other, on numerous occasions, did intentionally, knowingly and unlawfully distribute and possess with the intent to distribute oxycodone (percoset), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 2.

A TRUE BILL


FOREPERSON

3/11/15
DATE


PETER J. SMITH
UNITED STATES ATTORNEY